

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

V.

RICHARD GOULD,

Defendant

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Case No. 1:21-cr-00159-JPC

Judge J. Philip Calabrese

**DEFENDANT'S MOTION TO
CONTINUE SENTENCING HEARING**

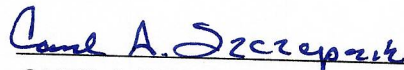
The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby respectfully requests that the sentencing hearing scheduled for 2:00 p.m. on April 18, 2023, be continued to a rescheduled date after June 29, 2023. In support of this motion, counsel states the following facts:

1. The Defendant had surgery on his spine performed by Dr. Jason W. Savage on March 29, 2023.
2. The above-referenced surgery was scheduled on short notice because of the mobility difficulties the Defendant was experiencing.
3. Initially the Defendant hoped to be sufficiently recovered from the surgery to attend the April 18, 2023, sentencing hearing in order to finalize the pending matter. In the past week his level of pain has increased and he has been required to resume taking prescribed pain medications to alleviate his pain.
4. The prescribed pain medications inhibit the Defendant's competent state and will hinder his meaningful participation in a sentencing hearing.

5. A letter is attached hereto as Exhibit A from the office of Dr. Jason W. Savage, confirming the three month expected time of recovery and the pain medications currently prescribed for the Defendant.
6. Counsel has been in contact with Assistant United States Attorney Brian McDonough who has indicated he has no opposition to this motion.

WHEREFORE, it is prayed this motion to continue the sentencing hearing be granted.

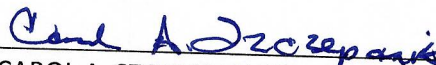
Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this Motion to Continue was sent to Assistant United States Attorney Brian McDonough on April 13, 2023, by e mail addressed to Brian.McDonough@usdoj.gov.



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Attorney for Defendant

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Appointments: (216) 636-5860

April 12, 2023

Dear Carol Szczepanik, J.D.,

This letter is to certify Richard A Gould (1/10/1956) is my patient. Mr. Gould had L2-L3 decompression. Full recovery is expected 3 months post surgery (time may vary). Mr. Gould is prescribed Robaxin, Oxycodone and NSAIDS for back pain. Follow up appointment with surgeon scheduled for 5/4/2023

If you have any questions please do not hesitate to contact my office directly.

Sincerely,

[Electronically Signed to Expedite]

Dr. Jason Savage

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This letter was initially viewed by Richard A Gould at 4/13/2023 2:05 PM.
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